Advocating for Best Practices In Addiction Treatment

The NAATP Quality Assurance Program

Values and Proficiency
The Value of Public Policy Advocacy

• We all Have Two Jobs to Do
  • The Client in Front of Us Today
  • Making it Better for The Client Tomorrow through Public Policy Advocacy

• NAADAC and NAATP
  • Industry Advocacy Collaboration
The National Association of Addiction Treatment Providers (NAATP)

• 41 Years as Industry Professional Membership Society and Trade Association for Addiction Treatment Providers

• Representing 900 Treatment Facilities

• Goal is to Promote The Best Possible Addiction Treatment for the Most Possible People
The State of Addiction Treatment in the U.S.

• The Good News
  • We have greater capacity to treat addiction than ever before
  • It is a treatable disease
  • We’ve won a lot of battles to get here
    • The public and policy-makers are listening
    • Payment mechanisms are in place and money is more available

• The Bad News
  • Parity is still not adequately implemented
  • Greed generated opioid crisis added to existing addiction crisis
  • The irony of “payment mechanisms are in place and money is more available”
    • Here come the unscrupulous profiteers
The Unscrupulous Profiteer

- A minority but aggressive, highly competitive element of predatory entrepreneur coming into the addiction “space”
- Profit motivation above all
- If it’s not specifically prohibited, they will do it
- There is a criminal element as well:
  1. Patient Brokering
  2. Predatory Web Practices (*Unbranded Sites, etc.*)
  3. Insurance and Billing Abuses
  4. Program Misrepresentation
  5. Unethical Advertising Schemes
     *Scruffy Fake TV Dr., etc.*
The Impact

• Poor Treatment for the Patient

• Scares People Away from Care they Need

• Harm to the Reputation of Good Providers

• Makes the Payer/Insurer Skittish

• Makes us Vulnerable to False Solution
The NAATP Response

A Three Legged Stool

1 The Ethics Code and Complaint System

2 The Outcomes Measures

3 The Quality Assurance Guidebook
NAATP Cleaned House First

2018

70 Members Denied Membership
$100,000 Loss
No Congratulations are in Order
Simply the Right Thing to Do

And Our Membership Blossomed!
Uniform Industry Standard for Ethical Practice

Four Sections

- Preamble: Philosophy of Values Based Care
- Management
- Facilities
- Marketing
  - Financial Rewards
  - Deceptive Marketing
  - Patient Identities
Ethics Code Preamble

- Members must adhere to the highest levels of professionalism and ethical conduct through the entire continuum and spectrum of clinical and business services.
- Best practices include values-based ethical business practice.
- All NAATP members must adhere to the code.
- NAATP Members agree to be removed for violation
Unethical Practice 1: Patient Brokering

**Code Section IV, A, 1-5**

**SECTION IV: Marketing**

A. Financial Rewards for Patient Referrals

1. Patient brokering is prohibited. No financial rewards, substantive gifts, or other remuneration may be offered or received for patient referrals. NAATP members must not provide compensation for a patient referral. A NAATP member must not charge or receive compensation for providing a referral.
   
   2. …may not compensate referral out…

   3. …may not engage in the buying and selling of leads…

   4. …may not use misleading language in advertising.

   4. …no inducements…

   5. …no waiver of patient responsibility as to deductibles and co-pay…
Unethical Practice 2: Predatory Web Practices

*Code Section IV, B1, B2*

- NAATP Members must clearly brand all advertising. All advertisements and promotional materials must prominently display the treatment center name and brand. Advertisements placed through third parties such as addiction related websites must be marked as such.

- NAATP members must not engage in false, deceptive, or misleading statements, advertising, or marketing practices, including but not limited to services, license, and accreditation misrepresentation.
Unethical Practice 3: Insurance and Billing Abuse

Code Section II D, III E, IV 5

- Fee structures must be reasonable, transparent and available to the public.

- NAATP members must collect reasonable fees and rent from the patient for sober living and other non-clinical or ancillary services provided alongside outpatient services.

- Routine waiver of patient financial responsibility related to deductibles and co-pays is prohibited. Waivers must not be provided except in the case of demonstrable financial hardship based on written objective criteria.
Unethical Practice 4: Payment Kickbacks

Code Section IV A2, B1

- NAATP members may refer families or individuals to treatment or recovery support professionals, including interventionists, continuing care providers, monitoring agencies, and referral sources that offer services to patients. NAATP members must not compensate such individuals or organizations in exchange for referrals, either in the form of direct payment, consulting contracts, fee splitting, or other compensation.

- NAATP members must not engage in false, deceptive, or misleading statements, advertising, or marketing practices, including but not limited to services, license, and accreditation misrepresentation.
Licensing and Accreditation

Code Section I, E

SECTION I: Treatment

E. NAATP members must be licensed and accredited for all services for which their regulatory body provides licensure and must comply with all such licensure requirements.
2nd Leg
Outcomes Measures Toolkit
Provider Guide to Standardized Outcomes Measurement

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The Addiction Treatment Provider Quality Assurance Guidebook

A Guide to the Core Competencies for the Delivery of Addiction Treatment Services

- Nine Core Competency Categories
- 32 Guidelines
- Each Followed by a Commentary and an Implementation Resource
The Nine Core Competencies

1. Operations
2. Admissions and Patient Screening
3. Employment, Training, and Credentialing
4. Billing
5. Discharge and Continuing Care
6. Outcomes Measures
7. Community Engagement, Public Relations, and Public Policy
8. Marketing, Advertising, and Visibility
9. Ethics
Congress Is Listening!

- October 2015 Hearing of the House Investigations and Oversight Subcommittee

- 2018 Federal Legislation
  - HR 6 Patient Brokering
  - FBI, FTC, and State Official Enforcement

- Reviewing NAATP Guidebook Now

- You this Afternoon!
Linked References

- The NAATP Addiction Industry Directory (AID)
- NAATP Code of Ethics 2.5
- NAATP Outcomes Measurement Toolkit
- NAATP Treatment Provider Guidebook
- NAATP Consumer Resources
- Treatment Center Discernment and Selection
Thank you!

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